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May 15, 2024

By ECF

The Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Chanette Lewis et al.*, No. 21 Cr. 729
Client: Tatiana Daniel

Dear Judge Kaplan:

With the consent of the government and of Pretrial Services, I write to respectfully request a 30-day extension of the June 6, 2024, surrender date.

The Bureau of Prisons has yet to inform Ms. Daniel of the facility to which she is to report. Moreover, Ms. Daniel is trying to earn as much money as she can to fund her commissary account while she is incarcerated. Many if not most people in BOP custody have family or other supporters add money to their commissary account. Ms. Daniel does not have anyone who can or will do that for her, and she reports that she was unable to work for approximately two weeks in April due to a flu-like illness and has, thus, lost some of the earnings that she was relying upon. A later surrender date would provide Ms. Daniel with the opportunity to gather the necessary financial resources to better equip her for her term of imprisonment.

Accordingly, we respectfully request that the Court grant Ms. Daniel an extension of her surrender date to July 8, 2024. I have conferred with AUSA Michael Neff and Pretrial Services Officer Christina Venable, who both inform me that neither the government nor Pretrial Services object to this request. The Court's considerate attention to this matter is greatly appreciated.

Respectfully submitted,

Ezra Spilke

cc: Tatiana Daniel, by email
AUSA Michael Neff, by ECF
Christina Venable, Pretrial Services, by email

RECORDED

LEWIS A. KAPLAN, U.S.D.J.

5/16/24